



3. Section 393.140(11) specifies that, unless the Commission orders otherwise, a change shall not be made to any rate filed by an electrical corporation except after thirty days' notice to the Commission and publication for thirty days as required by order of the Commission. However, Section 393.140(11) expressly provides that, for good cause shown, the Commission may allow tariff changes without requiring thirty days' notice. Good cause exists to make KCP&L's compliance tariffs effective on or before the operation of law date in this case because the Commission has already found that KCP&L is presently in a revenue deficient position of approximately \$245,000 per day on average, and the Commission has already authorized and directed KCP&L to file the tariffs that are filed concurrently with the filing of this Motion.

4. As provided in 4 CSR 240-2.080(14), KCP&L requests that the Commission approve the compliance tariffs effective September 15, 2015<sup>2</sup> or as soon as possible thereafter and in any event, no later than September 29, 2015, the operation of law date in this case. The Commission, as noted earlier, has good cause to do so. Furthermore, KCP&L states that by doing so, the Commission will avoid the harm that would be caused by any delay in allowing rates determined to have been just and reasonable to take effect. Moreover, there can be no negative effect on anyone – ratepayers or KCP&L – if the compliance tariffs are approved to be effective September 29, 2015 or earlier if possible because this will allow the rates determined by the Commission to be just and reasonable rates to in fact be charged for the electric service provided by KCP&L.

5. This Motion was filed as soon as it could have been under the circumstances.

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<sup>2</sup> KCP&L acknowledges State ex rel. OPC v. PSC, 409 S.W.3d 522 (Mo.App. 2013) and assumes Commission compliance therewith.

**WHEREFORE**, for the foregoing reasons and for good cause shown, KCP&L respectfully requests that the Commission grant this Motion, and approve the tariff sheets KCP&L has filed to be effective for service rendered on and after September 15, 2015 or as soon as possible thereafter but in any event no later than September 29, 2015.

Respectfully submitted,

*/s/ Roger W. Steiner*

Robert J. Hack, MBN 36496  
Roger W. Steiner, MBN 39586  
Kansas City Power & Light Company  
1200 Main Street, 16<sup>th</sup> Floor  
Kansas City, MO64105  
Telephone: (816) 556-2314  
Facsimile: (816) 556-2787  
Email: [rob.hack@kcpl.com](mailto:rob.hack@kcpl.com)  
[roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

James M. Fischer, MBN 27543  
Fischer & Dority, PC  
101 Madison, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383  
Email: [jfischerpc@aol.com](mailto:jfischerpc@aol.com)

**Attorney for Kansas City Power & Light Company**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8<sup>th</sup> day of September, 2015.

*/s/ Roger W. Steiner*

Roger W. Steiner